

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Alicia Holland,

Plaintiff,

v.

Beaufort County and James Beckert,
Individually and in his Official Capacity,

Defendants.

Civil Action No. 9:20-cv-3479-DCN-MHC

**DEFENDANT'S ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES TO BE
ANSWERED BY EACH PARTY**

COMES NOW the Defendant James Beckert, Individually and in his Official Capacity, answering the Local Civ. Rule 26.01 (D.S.C.) Interrogatories as follows:

I. ANSWERS TO INTERROGATORIES

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None known by Defendant.

B. As to each claim, state whether it should be tried by jury or non-jury and why.

ANSWER: All of Plaintiff's claims are properly tried by a jury and, as such, a jury should try the entire matter.

C. State whether the party submitted these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: The Defendant is not a publicly owned company in either his individual capacity or his capacity as the Auditor for Beaufort County.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

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Answers to Rule 26.01 Interrogatories

ANSWER: The Defendant believes that due to the Federal Question raised in 42 USC §1983 allegations that this matter is best heard in Federal Court.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

ANSWER: Upon information and belief, no.

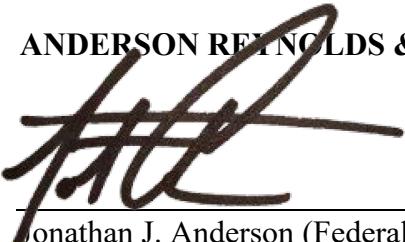
F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: The Complaint properly identifies the Defendant.

G. If you contend that some other person or legal entity is in whole, or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: The Defendant makes no such contention at this time but retains the right to amend this answer at any appropriate point during litigation.

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Attorneys for James Beckert, individually and in his official role.

30 September 2020
Charleston, South Carolina